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UNITED STATES DISTRICT COURT
DISTRICT OF WYOMING

United States of America,

Plaintiff,

v.

Civil No. 2:07-cv-19-CAB

Jane Joyce Rice; Water Garden, Inc.;
Perpetual Legacy Corp.; Carte Blanche
Trust; & Newport Pacific Trust Co.,
Ltd.;

Defendants.

**PLAINTIFF UNITED STATES OF AMERICA'S
MOTION TO EXTEND TIME FOR SERVICE**

Plaintiff the United States of America ("the United States"), through its undersigned counsel, hereby moves this Court, pursuant to Fed. R. Civ. P. 4(m), for an Order extending the time to serve the Summons and Complaint upon Defendants Water Garden, Inc., Perpetual Legacy Corp., Carte Blanche Trust, and Newport Pacific Trust Co., Ltd., by 42 days, and states as follows in support:

Since the United States filed the Complaint in this action on January 19, 2007, service of the Summons and Complaint is currently due to be completed by May 19, 2007. *See* Fed. R. Civ. P. 4(m). As discussed more thoroughly in its Motion for Service by Publication filed herewith, the United States has been unable to locate several of the defendants in this matter. Accordingly, the United States has requested permission to serve these defendants by publication. Under Wyoming law, service by publication requires publication in no less than four consecutive weeks. *See* Wy. R. Civ. P. 4(g). Thus, should the Court grant the United States' Motion for Service by Publication, service will not be completed before one month after the Court grants leave to serve by publication. And, should the court deny the United States' Motion for Service by Publication, the United States will be required to engage in a search for entities which most likely do not actually exist – undoubtedly a time consuming endeavor. In any event, it will not be possible for the United States to complete service within the allotted

time unless the deadline for service is extended.

WHEREFORE, the United States prays that the Court issue an Order extending the time limit to serve the Summons and Complaint upon Defendants Water Garden, Inc., Perpetual Legacy Corp., Carte Blanche Trust, and Newport Pacific Trust Co., Ltd., by 42 days.

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Dated: May 7, 2007

s/ Michael G. Pitman
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